

Appl. No. 10/792,366
Examiner: VU, PHU, Art Unit 2871
In response to the Office Action dated July 27, 2005

Date: October 27, 2005
Attorney Docket No. 10113881

AMENDMENTS TO THE DRAWINGS

The attached two (2) sheets of drawings include changes to Figures 1a and 1b. Replacement Sheet 1 replaces the original sheet for Figure 1a, while Replacement Sheet 2 replaces the original sheet for Figure 1b.

Attachment: Replacement Sheets (2)

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REMARKS

Applicant thanks the Examiner for acknowledging Applicant's claim to foreign priority and receipt of the certified copy of the priority document. Responsive to the Office Action mailed on July 27, 2005 in the above-referenced application, Applicant respectfully requests amendment of the above-identified application in the manner identified above and that the patent be granted in view of the arguments presented. No new matter has been added by this amendment.

Present Status of Application

Claims 1-16 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. Claims 1-7, 9-11 and 13-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Park (US 2003/0071767) in view of Cha et al (US 6,519,020). Claims 8, 12 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Park in view of Cha et al and in further view of Yuuki et al (US 6,181,071).

In this paper, amended drawings are provided for Figs. 1a and 1b, as described in further detail below. Claim 13 is amended to more clearly describe the embodiment of the invention described on page 7, lines 22-26 of the specification.

Reconsideration of this application is respectfully requested in light of the amendments and the remarks contained below.

Drawings

Amended Figs. 1a and 1b are provided to more clearly show which element shown in the figures corresponds to which element described in the specification.

Applicant submits that no new matter has been added by the amendments to the drawings.

Rejections Under 35 U.S.C. 112

Claims 1-16 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the

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invention. More specifically, the Examiner argues that claims 1, 9 and 13, as well as the figures, fail to show any connection between the anti-ESD wire and the liquid crystal display module. Applicant respectfully traverses the rejections for the reasons as follow.

Claims 1, 9 and 13 respectively recite an electronic device, a method, and a machine readable storage medium for preventing ESD in a liquid crystal display module. As described in the specification, recited in the claims, and shown in the figures, the liquid crystal display module 20 includes a central portion 21, a surrounding portion 22, and an anti-ESD wire 23. The anti-ESD wire 23 is disposed on the surrounding portion 22 of the liquid crystal display module 20. See page 5, line 17 to page 6, line 7 of the specification, Figs. 1a, 1b and 2, and claims 1, 9 and 13.

It is therefore quite clear from Applicant's disclosure that the liquid crystal display module is comprised of a central portion, a surrounding portion and an anti-ESD wire. As expressly recited in the claim, the anti-ESD wire is a sub-element of the liquid crystal display module. Furthermore, the central portion of the liquid crystal display module is described as being surrounded by the surrounding portion of the liquid crystal display module, and the anti-ESD wire is described as being disposed on the surrounding portion of the liquid crystal display module.

Applicant therefore submits that the structural cooperative relationship between the elements of the liquid crystal display module, namely the central portion, the surrounding portion, and the anti-ESD wire, is clearly recited in the claims 1, 9, 13, as well as shown in the figures. Withdrawal of the rejections under 35 U.S.C. 112 is respectfully requested.

Rejections Under 35 U.S.C. 103(a)

Claims 1-7, 9-11 and 13-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Park in view of Cha et al. Claims 8, 12 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Park in view of Cha et al and in further view of Yuuki et al. Applicant respectfully traverses the rejections for the reasons as follow.

Park discloses an apparatus for preventing lock-up of an LCD comprising an LCD 100, and a wire connecting the LCD to ground. See Fig. 2 of Park.

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Cha et al disclose a liquid display module comprising a LCD panel 10, electrode patterns of TCPs 40, 50 and a gate-source integrated type drive FPC 60. The LCD panel 10 includes an upper panel 12 and a lower panel 14. The FPC 60 comprises gate drive portion 61 and a source drive portion 62. See Fig. 3 and column 5, lines 2334 of Cha et al.

The rejections of claims 1-16 are insufficient, insofar as they do not comply with the requirements of MPEP 707.07 et seq., which requires that all rejections be stated with completeness and clarity.

MPEP 707.07(d) requires that the grounds of a rejection be "fully and clearly stated." The office action fails to meet this requirement in the present application in connection with claims 1, 9 and 13.

Claims 1, 9 and 13 each recite that a liquid crystal display module is provided comprising a central portion, a surrounding portion, and an anti-ESD wire, wherein the central portion is surrounded by the surrounding portion, and the anti-ESD wire is disposed on the surrounding portion of the liquid crystal display module, **and the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion.**

The office action relies on Park to teach a liquid crystal display module and an anti-ESD wire. The Examiner acknowledges that Park fails to show, a printed circuit board with a ground layer, a central portion and a surrounding portion of the liquid crystal display module, or that wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion. See page 3 of the office action. The Examiner appears to rely on Cha et al to teach these features.

However, with respect to claims 1, 9 and 13, the office action fails to fully and clearly state what teaching in the prior art is relied upon to disclose an anti-ESD wire disposed on the surrounding portion of the liquid crystal display module, **and the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion.** Furthermore, no reason is

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given why this would be an obvious modification of the combination of Park and Cha et al.
Namely, this key feature of the claims is simply not addressed in the office action.

In addition, with respect to claim 1, the office action further fails to fully and clearly state what element in Cha et al is relied upon to teach the printed circuit board with a ground layer.

As the office action fails to state with completeness and clarity any teaching or suggestion of at least the limitations noted above, Applicant submits that the rejection of claim 1-16 should be withdrawn. Should an ensuing office action be mailed which provides new grounds for the rejection of claims 1-16, such an ensuing office action should be made non-final.

Whether taken alone or in combination, Park and Cha et al fail to teach or suggest an electronic device, a method, or a machine readable storage medium for preventing ESD, wherein a liquid crystal display module is provided comprising a central portion, a surrounding portion, and an anti-ESD wire, wherein the central portion is surrounded by the surrounding portion, and the anti-ESD wire is disposed on the surrounding portion of the liquid crystal display module, and the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion, as recited in claim 1, 9 and 13.

MPEP 2142 reads in part:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In connection with the third criteria, MPEP 2143.03 goes on the state:

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To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

As clearly shown in Fig. 3 of Cha et al, the gate-source integrated type drive FPC 60/source drive portion 62 do not "surround" the LCD panel 10. In addition, the electrode patterns of TCPs 40, 50 connect the lower panel 14 of the LCD panel with the gate-source integrated type drive FPC 60.

Furthermore, even when combined in the manner described by the Examiner, namely placing the anti-ESD wire of Park on the so-called "surrounding portion" 62 of Cha et al, there is no teaching in either reference that the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion.

Thus, Applicant submits that the prior art relied upon by the Examiner fails to teach or suggest a liquid crystal display module disposed on a printed circuit board. The cited prior art further fails to teach or suggest that a central portion of the liquid crystal display module is surrounded by a surrounding portion of the liquid crystal display module. Finally, the cited prior art fails to teach or suggest that an anti-ESD wire of the liquid crystal display module is disposed on the surrounding portion, and wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion.

It is therefore Applicant's belief that even when taken in combination, the prior art references relied upon by the Examiner do not teach or suggest all the limitations of claims 1, 9 and 13. For at least this reason, a *prima facie* case of obviousness cannot be established in connection with these claims. Furthermore, as it is Applicant's belief that a *prima facie* case of obviousness is not established for claims 1, 9 and 13, the Examiner's arguments in regard to the dependent claims are considered moot and are not addressed here. Allowance of claims 1-16 is respectfully requested.

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The rejections impermissibly rely on hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.

In *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780 (Fed. Cir. 1992), the Federal Circuit stated:

It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior so that the claimed invention is rendered obvious. *In re Gorman*, 933 F.2d 982, 987, 18 USPQ2d 1885, 1888 (Fed. Cir. 1991). This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention." (quoting *In re Fine*, 837 F.2d at 1075, 5 USPQ2d at 1600).

Applicant submits that the only teaching of the limitation of claims 1, 9 and 13 that an anti-ESD wire is disposed on the surrounding portion of the liquid crystal display module, and the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion, comes from Applicant's own disclosure.

More specifically, the Examiner argues that it would have been obvious to place the ground wire of Park in the so-called "surrounding portion" 62 of Cha et al to create an LCD that is slim and light. However, with reference to Fig. 3 and the related disclosure in Cha et al, it is evident that such a disposition of the ground wire would not in fact reduce the thickness or weight of the LCD, nor is such a possibility discussed in either of the references.

Furthermore, the Examiner fails to address the limitation that the wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion. The Examiner therefore also appears to believe that it would have been obvious to dispose the wiring of the Cha et al LCD on the "surrounding portion" 62 and inside the ground wire. Once again, however, there is no teaching or suggestion of this feature in either reference relied upon in the rejections.

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Stated differently, the rejections point to the isolated disclosure of the anti-ESD wire in the Park reference and combine it with the disclosure of the Cha el al reference using the claims of the instant application as templates. It is therefore the Applicant's belief that the present rejection fits the Federal Circuit's description of an impermissible rejection under §103(a).

Conclusion

The Applicant believes that the application is now in condition for allowance and respectfully requests so.

Respectfully submitted,



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